The Honorable Tana Lin 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 KADIR K. AGA, et al., Case No. 2:24-cv-00505-TL 10 Plaintiffs, STIPULATED MOTION TO HOLD CASE IN ABEYANCE AND 11 [PROPOSED] ORDER v. 12 ANTHONY BLINKEN, et al., Noted for Consideration: June 21, 2024 13 Defendants. 14 15 Plaintiffs and Defendants, by and through their counsel of record, pursuant to Federal 16 Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and 17 move to stay these proceedings until August 19, 2024. Plaintiffs bring this litigation pursuant to 18 the Administrative Procedure Act and Mandamus Act seeking, inter alia, to compel the U.S. 19 Embassy in Addis Ababa, Ethiopia, to complete processing of their visa applications. 20 Defendants' response to the Complaint is currently due on June 21, 2024. For good cause, the 21 parties request that the Court hold the case in abeyance until August 19, 2024. 22 Courts have "broad discretion" to stay proceedings. Clinton v. Jones, 520 U.S. 681, 706 23 (1997). "[T]he power to stay proceedings is incidental to the power inherent in every court to 24 control the disposition of the causes on its docket with economy of time and effort for itself, for STIPULATED MOTION FOR ABEYANCE UNITED STATES ATTORNEY 1201 PACIFIC AVE., STE. 700 [Case No. 2:24-cv-00505-TL] - 1

TACOMA, WA 98402 (253) 428-3800

1	counsel, and for litigants." Landis v. N. Am. Co., 299 U.S. 248, 254 (1936); see also	
2	Fed. R. Civ. P. 1.	
3	With additional time, this case may	be resolved without the need of further
4	judicial intervention. The Embassy is currently reviewing information recently submitted	
5	by Plaintiffs. As additional time is necessary for this to occur, the parties request that the	
6	Court hold the case in abeyance until August 19, 2024. The parties will submit a status	
7	update on or before August 19, 2024.	
8	DATED this 21th day of June, 2024.	
9	Respectfully submitted,	
10	TESSA M. GORMAN United States Attorney	O'SULLIVAN LAW OFFICE
111 112 113 114 115 116	s/ Michelle R. Lambert MICHELLE R. LAMBERT, NYS #4666657 Assistant United States Attorney United States Attorney's Office Western District of Washington 1201 Pacific Avenue, Suite 700 Tacoma, Washington 98402 Phone: (253) 428-3824 Fax: (253) 428-3826 Email: michelle.lambert@usdoj.gov	s/ Jane Marie O'Sullivan  JANE MARIE O'SULLIVAN WSBA#34486 2417 Pacific Avenue SE, 2 <sup>nd</sup> Floor Olympia, Washington 98501 Phone: (206) 340-9980 Email: jane@osullivanlawoffice.com
17	Attorneys for Defendants	Attorney for Plaintiffs
18	I certify that this memorandum contains 231 words, in compliance with the Local Civil Rules.	
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## [PROPOSED] ORDER

The case is held in abeyance until August 19, 2024. The parties shall submit a status update on or before August 19, 2024. It is so **ORDERED**.

DATED this 25th day of June, 2024.

Jana Lin

United States District Judge